

## Attachment E

### Declaration of Angel Carter

Declaration of Angel Andrea Carter

Pursuant to 28 U.S.C. § 1746

I, Angel Andrea Carter, hereby declare and state as follows:

1. I am a U.S. Citizen over the age of eighteen and reside in Stockbridge, Georgia.

2. I have personal knowledge of the following facts, to which I could and would testify to if I were called to testify as a witness.

3. On or about March 1, 2019, I bought a car from U.S. Auto with a loan from U.S. Auto. I knew that U.S. Auto had installed a device in my car that would disable my car from starting if I was late on payments.

4. I made my car payments twice a month to USASF, my loan servicer, who would split my payments between insurance and my car note. I paid around \$237 in total, about \$200 would go towards the car note and around \$37 for insurance. I was never behind on my car payments.

5. Around February or March 2020, USASF sent me a notification – through the portal and email – that their payment system was being transferred. I had to log into a different website to make my payments. After this change, USASF was not picking up my payments correctly. I had to speak to a supervisor in customer service to fix the problem because USASF was putting my payments towards collateral protection insurance and not my car payment. This problem persisted for several months.

6. From this point onward, through at least October 2020, when I would put my key in the car, I would get a light and then there would be a dinging noise for some time, until I made a payment.

7. This would continue to happen even after I had made a payment. I had to call USASF to clear out the issue and make the warning tones stop and restart my car.

8. There also were times when my car was disabled without warning. I would need to call USASF and they would demand another payment. They would tell me the system showed I was past-due, but in reality, I had paid on time and it was their fault for not processing my payments correctly.

1           9.       These calls to USASF could take up to thirty minutes. First, I would have to wait on  
2 hold for long periods of time. Then, a representative would be unable to assist me and would have  
3 to connect me to a supervisor or collection officer, only to figure out that USASF had incorrectly  
4 applied my payment to insurance instead of my loan. It would take them one to two days to fix the  
5 information.

6           10.     I work in accounting from home. On several occasions, I would be ready to leave my  
7 home to pick up my child from school and the car would be disabled, even though I had made my  
8 car payment on time. I have to pick up my child by a certain time. After a while, if I don't show up,  
9 the school will call child protective services. I managed to get coverage by asking someone to pick  
10 up my child. Being put in this situation by USASF made me angry. There is no reason why I should  
11 have to contact USASF at the last minute because of their error. USASF made me feel like I didn't  
12 make my car payment. I would start off patient and I would explain the problem to them. But after  
13 going through three people to clarify, and only then would they realize it was their mistake, I would  
14 end up irate.

15          11.     When USASF disabled my car and I called to tell them I had already made my  
16 payment, USASF would at first turn my car back on for a couple of days until the payment was  
17 processed. But, once your car is disabled for non-payment, you only have two to three occasions  
18 when they will turn your car back on while they're processing your payment. This meant I had to go  
19 back to USASF and escalate the issue to get them to turn my car back on. This was unnecessary time  
20 that I will never get back. And if they still did not process the payment correctly, then my car would  
21 be automatically disabled. I would have to start over and go through the process again. This  
22 happened about fifteen times after February 2020, when they switched their system over.

23          12.     In addition to working in accounting, I also drove with Uber during this time. These  
24 shutoffs and warning tones impacted my ability to do extra work. Sometimes it would take a whole  
25 day before USASF turned the car on. This affected my income. Disabling my vehicle for the day  
26 cost me between \$100 to \$200 per day, and USASF did this at least two times.

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1           13.     My son would often drive the car, too. He heard the noise and would ask me about  
2 it. He would ask if I had paid my bill, and I would say that I had and would call to sort things out. I  
3 was embarrassed that my son had to ask me these kinds of questions.

4           14.     My son was on a traveling basketball team. He would sometimes have a team player  
5 in the car with him and I would not be sure whether they would make it back from their basketball  
6 game, which could be late at night, around 10 p.m. On one occasion, my son and his teammate  
7 could not get home after a game because USASF had disabled my car even though I had paid on  
8 time. I made an extra payment just for him to be able to get home. For two to three months, I made  
9 extra payments every week, almost \$500 in one week, to make sure he could get home.

10          15.     I was tired of this back and forth with USASF. I was looking into trading in the car  
11 with the Kia dealership. However, before I could trade it in, around January 2021, my car was stolen.

12          16.     USASF made me pay an extra \$1,000 on the GAP contract in order for them to  
13 close out my account, even though GAP insurance was supposed to cover the amount I owed on  
14 the loan following the theft. I could not understand how they could say I was behind on GAP  
15 insurance when I was paying for it all along.

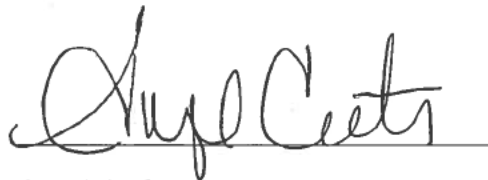
16          17.     I had a terrible experience with USASF. There were months of delays in resolving  
17 my loan after my car was stolen. I reached out many times trying to get more information. USASF  
18 did not send me my paperwork until after I contacted a lawyer to handle the GAP insurance.

19          18.     I filed a complaint with the Better Business Bureau in May 2021.  
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21                 I declare under penalty of perjury that the foregoing is true and correct.

22                 Executed on 10/27, 2023.

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A handwritten signature in black ink, appearing to read "Angel Carter", written over a horizontal line.

Angel Andrea Carter